

**United States Bankruptcy Court  
Eastern District of Pennsylvania**

In re:

Neil Charles Heinrich II,  
  
Debtor.

Case No. 23-11578-pmm

Chapter 13

Related to ECF No. 24

**Debtor's Objection to Motion for Relief from Stay filed by Pennsylvania  
Housing Finance Agency**

**AND NOW**, Debtor Neil Charles Heinrich II, by and through his attorney, hereby objects to the Motion for Relief from Stay filed by Pennsylvania Housing Finance Agency. Because the purported arrearage that gave rise to the Motion can be timely paid directly or through the chapter 13 plan, no grounds for relief exist and the Motion must be denied.

**NOW, THEREFORE**, the Debtor asks this Court to deny the Motion in the form of order attached and to grant such other and further relief in his favor as may be necessary and proper under the law.

Date: December 7, 2023

CIBIK LAW, P.C.  
*Counsel for Debtor*

By: /s/ Michael A. Cibik  
Michael A. Cibik (#23110)  
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**Certificate of Service**

I certify that on this date I caused a true and correct copy of the Debtor's Objection to Motion for Relief from Stay filed by Pennsylvania Housing Finance Agency to be served on all parties on the clerk's service list through the CM/ECF system.

Date: December 7, 2023

/s/ Michael A. Cibik  
Michael A. Cibik

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

In re:

Neil Charles Heinrich II,  
  
Debtor.

Case No. 23-11578-pmm

Chapter 13

Related to ECF No. 24

**Order Denying Motion for Relief from Stay filed by Pennsylvania Housing  
Finance Agency**

**AND NOW**, upon consideration of the Motion for Relief from Stay filed by Pennsylvania Housing Finance Agency, and the Debtor's objection thereto, and after notice and hearing, it is hereby **ORDERED** that the Motion is **DENIED**.

Date:

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Patricia M. Mayer  
U.S. Bankruptcy Judge